

---

**From:** David McGowan [McGowanD@api.org]  
**Sent:** 8/29/2017 5:14:26 PM  
**To:** White, Julia W [/o=ExchangeLabs/ou=Exchange Administrative Group  
(FYDIBOHF23SPDLT)/cn=Recipients/cn=d92f33e7d43e44a9b15d6ec92e2348cb-jwbuckner]  
**Subject:** RE: NC Fuel Waiver Request  
**Attachments:** 8.29.17 DARM Fuel Waiver Request.pdf

Thank you Julia. For reference, here is a copy of the letter Florida is sending. I have shared this with Tina and Stephen at DACS as well...

David McGowan, III  
Executive Director  
North Carolina Petroleum Council  
(919)256-3646 office  
(919)412-4200 cell  
[mcgowand@api.org](mailto:mcgowand@api.org)



**North Carolina Petroleum Council**  
A Division of the American Petroleum Institute

---

**CONFIDENTIAL & PRIVILEGED**

Unless otherwise indicated or obvious from the nature of the following communication, the information contained herein is attorney-client privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies, electronic, paper or otherwise, which you may have of this communication.

---

---

**From:** White, Julia W [mailto:Julia.white@nc.gov]  
**Sent:** Tuesday, August 29, 2017 5:11 PM  
**To:** David McGowan  
**Subject:** RE: NC Fuel Waiver Request

Draft that was shared with the Commissioner's office.

---

**From:** David McGowan [mailto:McGowanD@api.org]  
**Sent:** Tuesday, August 29, 2017 3:07 PM  
**To:** White, Julia W <Julia.white@nc.gov>  
**Subject:** RE: NC Fuel Waiver Request

Understood. Many thanks again!  
David

David McGowan, III  
Executive Director  
North Carolina Petroleum Council  
(919)256-3646 office  
(919)412-4200 cell  
[mcgowand@api.org](mailto:mcgowand@api.org)



**North Carolina Petroleum Council**  
A Division of the American Petroleum Institute

---

CONFIDENTIAL & PRIVILEGED

Unless otherwise indicated or obvious from the nature of the following communication, the information contained herein is attorney-client privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies, electronic, paper or otherwise, which you may have of this communication.

---

---

**From:** White, Julia W [<mailto:Julia.white@nc.gov>]

**Sent:** Tuesday, August 29, 2017 3:06 PM

**To:** David McGowan

**Subject:** Re: NC Fuel Waiver Request

Thanks, the Governor and Commissioner have talked and we are working on it.

On Aug 29, 2017, at 3:01 PM, David McGowan <[McGowanD@api.org](mailto:McGowanD@api.org)> wrote:

Hi Julia, thank you very much. I think either option would be fine. All I've been told is that EPA wants to hear from each state that needs the waiver. I don't think it matters whether the requests come in individually or collectively but time is of the essence so perhaps individually makes more sense.

Best,  
David

David McGowan, III  
Executive Director  
North Carolina Petroleum Council  
(919)256-3646 office  
(919)412-4200 cell  
[mcgowand@api.org](mailto:mcgowand@api.org)

<image002.jpg>

---

CONFIDENTIAL & PRIVILEGED

Unless otherwise indicated or obvious from the nature of the following communication, the information contained herein is attorney-client privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies, electronic, paper or otherwise, which you may have of this communication.

---

---

**From:** White, Julia W [<mailto:Julia.white@nc.gov>]

**Sent:** Tuesday, August 29, 2017 2:56 PM

**To:** David McGowan

**Subject:** RE: NC Fuel Waiver Request

Hello Dave: Thanks for this information. So we're clear, these requests would as individual letters from each state or as a regional request?

Julia

**JULIA WHITE**  
Deputy Chief of Staff  
Office of Governor Roy Cooper  
20301 Mail Service Center  
Raleigh, NC 27699-0301  
Office: (919) 814-2114

Mobile: (984) 204-3253

<image003.jpg> <image005.jpg>

E-mail to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

---

**From:** McKinney, William C  
**Sent:** Tuesday, August 29, 2017 2:20 PM  
**To:** Whichard, Jordan <[Jordan.Whichard@nc.gov](mailto:Jordan.Whichard@nc.gov)>; White, Julia W <[Julia.white@nc.gov](mailto:Julia.white@nc.gov)>  
**Cc:** Eudy, Ken <[ken.eudy@nc.gov](mailto:ken.eudy@nc.gov)>  
**Subject:** Fwd: NC Fuel Waiver Request

Julia/Jordan,

See below regarding a fuel waiver request to EPA as it relates to obtaining a waiver on fuel pressure in the wake of Harvey and the massive rain storms in Texas & Louisiana. The oil & gas industry is concerned about fuel supply and trying to get protocols in place but needs help with a 30 day waiver with EPA.

Kind regards,

wcm

---

**From:** David McGowan <[McGowanD@api.org](mailto:McGowanD@api.org)>  
**Sent:** Tuesday, August 29, 2017 2:10:37 PM  
**To:** McKinney, William C  
**Subject:** NC Fuel Waiver Request

William,

Following up on our phone conversation, here is some additional information about the waiver request. I have also attached the letter I sent to NCDACS Standards Division Director Stephen Benjamin yesterday. This letter explains the justifications behind the waiver requests and exactly what is needed to ensure maximum fuel supply for the state and region.

Essentially there are two requests of EPA:

- 1). Ask EPA to issue a regional waiver of Reid Vapor Pressure (RVP) regulations that would be applicable to Texas, Louisiana, Mississippi, Alabama, Florida, Georgia, South Carolina, North Carolina, & Tennessee. This waiver would enable industry to supply 11.5# RVP fuel to the states listed, rather than the 9.0# fuel that is required by EPA in most areas of the SE US until September 15<sup>th</sup>. This would essentially be a 17 day waiver.
- 2). Ask EPA to issue a waiver of Reformulated Gasoline regulations (mainly NE & Midwest states) so that Conventional Blendstocks can be co-mingled with RFG stocks in states where RFG is required.

Both of these requests will help ensure maximum “fungibility” of product, thus ensuring that industry is able to meet product demands without regard to boutique fuel requirements in certain areas of the country. In addition, allowing a higher RVP fuel (11.5# vs. 9.0#) increases the volume of fuel that refineries can produce which will hopefully help offset some of the production lost from facilities that had to shut down due to Harvey. Finally, these waivers will also enable refined products from Europe to be imported directly into East Coast ports.

Please let me know if you have further questions or need any additional information. We appreciate any assistance you can provide!

Take care,  
David

David McGowan, III  
Executive Director  
North Carolina Petroleum Council  
(919)256-3646 office  
(919)412-4200 cell  
[mcgowand@api.org](mailto:mcgowand@api.org)

<image006.jpg>

---

**CONFIDENTIAL & PRIVILEGED**

Unless otherwise indicated or obvious from the nature of the following communication, the information contained herein is attorney-client privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies, electronic, paper or otherwise, which you may have of this communication.

---

---

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

---

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

---

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.

---

Email correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties by an authorized state official.